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11	Counsel for Plaintiff Hydro Net LLC	
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14	UNITED STATES DISTRICT COURT	
15	NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION	
16		
17	HYDRO NET LLC,	Case No. 3:20-cy-04362-VC
18	in bite iver see,	
19	Plaintiff,	REQUEST TO CONTINUE CASE
20	V.	MANAGEMENT CONFERENCE [Civ. L.R. 6-2]
21	CELLPHONE-MATE, INC.,	
22	Defendant.	
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REQUEST AND [PROPOSED] ORDER FOR CONTINUANCE OF CMC

REQUEST BY PLAINTIFF HYDRO NET LLC

- 1. Plaintiff Hydro Net LLC hereby requests a continuance of the October 7, 2020 Case Management Conference, to November 9, 2020.
- 2. Plaintiff has served Defendant Cell-Phone Mate, Inc., but defendant has not appeared and is therefore in default. (See Exhibit A, filed herewith.) Plaintiff is in the process of attempting to contact defendant in order to determine whether this default was intentional. Plaintiff requests that the Case Management Conference and deadline for submission of the Case Management Conference Statement be continued.
- 3. The requested change will not alter any other date of any event or any deadline already fixed by Court order, other than the Case Management Conference date and Case Management Statement deadline.
- 4. In accordance with Local Rule 6-2, a declaration in support of this stipulation, including information about any prior extensions, and the justification for this request, is provided below.
 - 5. A proposed order is provided below.

Dated: October 1, 2020 Respectfully submitted,

By: <u>/s/ Steven W. Ritcheson</u>
Steven W. Ritcheson (SBN 174062)
INSIGHT, PLC

Isaac Rabicoff
(Pro Hac Vice admission to be filed)
RABICOFF LAW LLC
73 W Monroe St
Chicago, IL 60603
773-669-4590
isaac@rabilaw.com

Counsel for Plaintiff Hydro Net LLC

Hydro Net LLC

CERTIFICATE OF SERVICE The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on October 1, 2020. /s/ Steven W. Ritcheson

I, Steven W. Ritcheson, declare as follows, pursuant to Civ. L.R. 6-2:

- 1. I am a counsel of record in this action for Plaintiff. I am a member of the Bar of the State of California and of this Court. I have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.
- 2. I submit this declaration in support of Plaintiff's REQUEST FOR CONTINUANCE OF CASE MANAGEMENT CONFERENCE.
- 3. This the first request for continuance of the Case Management Conference.
- 4. Plaintiff requests a continuance of the Case Management Conference to November 9, 2020, and a corresponding extension of time to file the case management statement, because Defendant has not appeared and answered the Complaint yet.
- 5. The requested continuance of the Case Management Conference will only affect the deadline to submit the Case Management Statement. No other deadlines will be impacted.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: October 1, 2020 /s/ Steven W. Ritcheson

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1	[PROPOSED] ORDER
2	DICTO
3	IT IS HEREBY OORDERED that the Case is DISTR Conference is reset for
4	November 9, 2020 ata.m. A Jan ase Management Statement shall be filed no
5	later than 1 week before the new so e Manage difference
6	Date: October 2, 2020
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8	Judge Vince Chhabria
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10	FEBRAN DISTRICT OF CE
11	DISTRICT
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